

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAMON M. JOSEPH,
ABDULLAH ALI YUSUF,

Defendant.

) INDICTMENT

) **3 : 19 CR 48**

) CASE NO.

) Title 18, Sections 249(a)(1)(A),
) (a)(1)(B)(i), (ii), 924(c)(1)(A)(i),
) 2339B(a)(1) United States Code
)

FILED

JAN 29 2019

**CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND**

JUDGE ZOUHARY

COUNT 1

(Attempt to Provide Material Support or Resources to a Foreign Terrorist Organization, in violation of 18 U.S.C. § 2339B(a)(1))

The Grand Jury charges:

1. From as early as September 18, 2018, through approximately December 7, 2018, in the Northern District of Ohio, Western Division, and elsewhere, Defendant DAMON M. JOSEPH, aka ABDULLAH ALI YUSUF, a citizen of the United States, did knowingly attempt to provide material support and resources, as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel (including himself) and services, to a foreign terrorist organization, namely the Islamic State of Iraq and the Levant (ISIL), also known as the Islamic State of Iraq and al-Sham or ISIS, which at all relevant times was designated by the Secretary of State as a foreign terrorist organization pursuant to Section 219 of the Immigration and Nationality Act, knowing that the organization was a designated terrorist organization and that the organization has engaged in and engages in terrorist activity and terrorism, in violation of Title 18, United States Code, Section 2339B(a)(1).

COUNT 2

(Attempt to Commit a Hate Crime, in violation of 18 U.S.C. § 249(a)(1)(A) and (a)(1)(B)(i), (a)(1)(B)(ii))

The Grand Jury further charges:

2. On or between October 30, 2018 and December 7, 2018, in the Northern District of Ohio, Western Division, Defendant DAMON M. JOSEPH, aka ABDULLAH ALI YUSUF, attempted to willfully cause bodily injury to members of the Toledo Jewish community who were at Location A, which is known to the grand jury, through the use of firearms, to wit: two rifles, because of the actual and perceived religion of the people at Location A. The conduct included an attempt to kill. All in violation of Title 18, United States Code, Section 249(a)(1)(A) and (a)(1)(B)(i), (ii).

COUNT 3

(Possession of Firearms in Furtherance of a Crime of Violence,
in violation of 18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

3. On or about December 7, 2018, in the Northern District of Ohio, Western Division, Defendant DAMON M. JOSEPH, aka ABDULLAH ALI YUSUF, did knowingly possess firearms in furtherance of a crime of violence for which Defendant may be prosecuted in a court of the United States, to wit: Attempt to Commit a Hate Crime, in violation of Title 18, United States Code, Section 249(a)(1)(A) and (a)(1)(B)(i), (ii), as set forth in Count 2 herein, all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.